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Jeffrey M. Nelson Chief Counsel & Director of Legal Services

August 28, 2018

## VIA ELECTRONIC FILING

Jocelyn G. Boyd, Esquire Chief Clerk & Administrator Public Service Commission of South Carolina 101 Executive Center Drive, Suite 100 Columbia, South Carolina 29210

> RE: Application of SouthEast Transportation Services, LLC for a Class C (Non-Emergency) Certificate of Public Convenience and Necessity for Operation of Motor Vehicle Carrier

Docket No. 2018-179-T

Dear Ms. Boyd:

The South Carolina Office of Regulatory Staff (ORS) has reviewed all related statutes and regulations regarding SouthEast Transportation, LCC's (SouthEast) request and can find no prohibition against granting the request. However, there are potential administrative issues that may be created by granting SouthEast's request. Both ORS and the Public Service Commission of South Carolina (PSC) use the STARSYSTEM tracking data base. This data base is used to track certificate numbers, decal payments, active and inactive certificates among other administrative items. ORS is unclear if granting the request to SouthEast and transferring the Class C Charter Certificate Number 7804-A to a Class C Non-Emergency Certificate Number 7804-A will corrupt the data base and create tracking and other administrative issues.

ORS recommends that the request to transfer the certificate number 7804-A from a Class C Charter Certificate to a Class C Non-Emergency Certificate be held in abeyance for the 90-day period requested by SouthEast to complete the requirements of Order No. 2018-380. This wil

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allow ORS and the PSC to discuss the technical and administrative issues that may arise in the database as a result of transferring the numbers. In the meantime, ORS recommends that the vehicles operating by SouthEast as Class C Charter vehicles be able to maintain the certificate number 7804-A for the period that this request is held in abeyance.

Sincerely,

ffley M. Nelson

cc: Joseph Melchers, Esquire (via E-mail)

Mark Watts, Southeast Transportation Services, LLC